

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Plaintiff/Counterclaim-Defendant,

v.

PLATFORM SOLUTIONS, INC.,

Defendant/Counterclaimant.

Civil Action No. 06-cv-13565-SCR

**RULES 7.1 DISCLOSURE STATEMENT
OF DEFENDANT/COUNTERCLAIMANT
PLATFORM SOLUTIONS, INC.**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure [formerly Local General Rule 1.9] and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Defendant/Counterclaimant Platform Solutions, Inc. (a private non-governmental party) certifies that (a) Defendant/Counterclaimant has no parent company, and (b) the following publicly-held corporation owns ten percent or more of its stock: Goldman Sachs & Co.

By: /s/ James Southwick
James Southwick (JS-4264)
SUSMAN GODFREY L.L.P.
590 Madison Ave., 8th Flr.
New York, NY 10022
(212) 336-8330

Attorney for Defendant/Counterclaimant
Platform Solutions, Inc.